

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified Surveillance time interval and allowed extension per Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a.
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

BASES

---

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that SRs must be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Surveillance time interval and allowed extension, in accordance with Specification 4.0.2, constitutes a failure to meet the Limiting Condition for Operation.

### 3/4.0 APPLICABILITY BASES

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception Limiting Condition for Operation are only applicable when the Special Test Exception Limiting Condition for Operation is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given OPERATIONAL CONDITION or other specified condition.

Surveillances, including Surveillances invoked by ACTION requirements, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current OPERATIONAL CONDITION or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to an OPERATIONAL CONDITION or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at > 950 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of Specification 4.1.3.2 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 950 psi to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

### 3/4.0 APPLICABILITY BASES

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Surveillance time interval and allowed extension. A delay period of up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Surveillance time interval and allowed extension was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Surveillance time interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering OPERATIONAL CONDITION 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to have not been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified Surveillance time interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of OPERATIONAL CONDITION changes imposed by ACTION requirements.

Failure to comply with specified Surveillance time intervals and allowed extensions for SRs is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

### 3/4.0 APPLICABILITY

#### BASES

While up to 24 hours or the limit of the specified Surveillance time interval is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period or the variable is outside the specified limits, then the equipment is inoperable and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the allowed times specified in the ACTION requirements, restores compliance with Specification 4.0.1.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.

## ADMINISTRATIVE CONTROLS

### 6.4 DELETED

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

##### FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Regulatory Assurance

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

##### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

##### MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

##### QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

## ADMINISTRATIVE CONTROLS

### UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 or another Manager in Operations shall hold a Senior Reactor Operator License.

ADMINISTRATIVE CONTROLS  
PROCEDURES AND PROGRAMS (Continued)

g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54 (o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163 "Performance-Based Containment Leakage Test program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 44.0 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , shall be 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary Containment leakage rate acceptance criterion is less than or equal to  $1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are less than or equal to  $0.60 L_a$  for the Type B and Type C tests and less than or equal to  $0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1) Overall airlock leakage rate is less than or equal to  $0.05 L_a$  when tested at greater than or equal to  $P_a$ .
  - 2) Seal leakage rate is less than or equal to 5 scf per hour when the gap between the door seals is pressurized to 10 psig.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the tests described in the Primary Containment Leakage Rate Testing Program.

h. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of b. above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified Surveillance time interval and allowed extension per Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a.
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

## APPLICABILITY

### BASES

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that SRs must be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Surveillance time interval and allowed extension, in accordance with Specification 4.0.2, constitutes a failure to meet the Limiting Condition for Operation.

## APPLICABILITY

### BASES

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception Limiting Condition for Operation are only applicable when the Special Test Exception Limiting Condition for Operation is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given OPERATIONAL CONDITION or other specified condition.

Surveillances, including Surveillances invoked by ACTION requirements, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current OPERATIONAL CONDITION or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to an OPERATIONAL CONDITION or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at > 950 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of Specification 4.1.3.2 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 950 psi to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

## APPLICABILITY

### BASES

---

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Surveillance time interval and allowed extension. A delay period of up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Surveillance time interval and allowed extension was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Surveillance time interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering OPERATIONAL CONDITION 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to have not been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified Surveillance time interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of OPERATIONAL CONDITION changes imposed by ACTION requirements.

Failure to comply with specified Surveillance time intervals and allowed extensions for SRs is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

## APPLICABILITY

### BASES

While up to 24 hours or the limit of the specified Surveillance time interval is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period or the variable is outside the specified limits, then the equipment is inoperable and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the allowed times specified in the ACTION requirements, restores compliance with Specification 4.0.1.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.

6.2.2 UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 or another Manager in Operations shall hold a Senior Reactor Operator License.

## ADMINISTRATIVE CONTROLS

---

### 6.4 DELETED

### 6.5 REVIEW AND AUDIT

#### 6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

##### FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

##### COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Regulatory Assurance

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

##### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

##### MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

##### QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

## ADMINISTRATIVE CONTROLS

### PROCEDURES AND PROGRAMS (Continued)

#### g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54 (o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163 "Performance-Based Containment Leakage Test program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 44.0 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , shall be 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary Containment leakage rate acceptance criterion is less than or equal to  $1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are less than or equal to  $0.60 L_a$  for the Type B and Type C tests and less than or equal to  $0.75 L_a$  for Type A tests;
- b. Air lock testing acceptance criteria are:
  - 1) Overall airlock leakage rate is less than or equal to  $0.05 L_a$  when tested at greater than or equal to  $P_a$ .
  - 2) Seal leakage rate is less than or equal to 5 scf per hour when the gap between the door seals is pressurized to 10 psig.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the tests described in the Primary Containment Leakage Rate Testing Program.

#### h. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of b. above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).